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*The Trusted Integrator for Sustainable Solutions*

REMOVAL SUPPORT TEAM 2  
EPA CONTRACT EP-W-06-072

December 26, 2013

Mr. Angel Rodriguez, On-Scene Coordinator  
U.S. Environmental Protection Agency  
Response and Prevention Branch  
Caribbean Environmental Protection Division, Region II  
1492 Peñuelas De Leon Ave., Suite 417  
San Juan, PR 00907-4127

**EPA CONTRACT No.: EP-W-06-072**

**TDD No.: TO-0029-0122**

**DOCUMENT CONTROL No.: RST 2-02-F-2637**

**SUBJECT: FINAL PHASE 1 REMOVAL ASSESSMENT SAMPLING TRIP REPORT,  
REVISION 1 – PUERTO RICO OLEFINS ASBESTOS SITE, PEÑUELAS,  
PUERTO RICO**

Dear Mr. Rodriguez,

Enclosed please find the Final Phase 1 Removal Assessment Sampling Trip Report, Revision 1 for the sampling activities conducted on November 21, 2013 and December 13, 2013 at the Puerto Rico Olefins Asbestos Site located in Peñuelas, Puerto Rico. The U.S. Environmental Protection Agency comments regarding the draft version of this deliverable have been incorporated. If you have any questions or comments, please do not hesitate to contact me at (787) 354-2489.

Sincerely,

Weston Solutions, Inc.

For Carlos Huertas  
RST 2 Site Project Manager

Enclosure

cc: TDD File No.: TO-0029-0122

**FINAL PHASE 1 REMOVAL ASSESSMENT  
SAMPLING TRIP REPORT, REVISION 1  
PUERTO RICO OLEFINS ASBESTOS SITE  
PEÑUELAS, PUERTO RICO**

**Prepared for:**

U.S. Environmental Protection Agency  
Region II – Response and Prevention Branch  
Edison, New Jersey 08837

**Prepared by:**

Removal Support Team 2  
Weston Solutions, Inc.  
East Division  
Edison, New Jersey 08837

DC No.: RST 2-02-F-2637  
TDD No.: TO-0029-0122  
EPA Contract No.: EP-W-06-072

December 2013

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**FINAL PHASE 1 REMOVAL ASSESSMENT**  
**SAMPLING TRIP REPORT, REVISION 1**

**SITE NAME:** Puerto Rico Olefins Asbestos Site  
**DC No.:** RST 2-02-F-2637  
**TDD No.:** TO-0029-0122  
**SAMPLING DATES:** November 21, 2013 and December 13, 2013

- 1. Site Location:** Peñuelas, Puerto Rico (N18°08'91" W66°43'24.57")  
Refer to Attachment A, Figure 1: Site Location Map.
- 2. Sample Descriptions:** Seven bulk samples, including one field duplicate, four soil samples, including one field duplicate, and 10 wipe samples, including one wipe blank. Refer to Attachment A, Figure 2: Sample Location Map and Attachment B, Table 1: Sample Collection Information Table.

**3. Laboratory Receiving Samples:**

Lab Name/Location	Sample Type	Parameters
EMSL Analytical, Inc. 200 Route 130 North Cinnaminson, NJ 08077	Bulk, Soil, and Wipe	Asbestos

**4. Sample Dispatch Data:**

On November 22, 2013, the first attempt to ship the samples collected from the Puerto Rico Olefins Asbestos Site (the Site) were mistakenly rejected by FedEx due to a misinterpretation of the dangerous goods shipping regulations. On November 25, 2013, Weston Solutions Inc., Removal Support Team 2 (RST 2) shipped five bulk samples, including one field duplicate, four soil samples, including one field duplicate, and 10 wipe samples, including one wipe blank, to the EMSL Analytical, Inc. laboratory located in Cinnaminson, New Jersey for asbestos analysis under Chain of Custody (COC) No. 00290122-112213-001 and FedEx Airbill No. 871377790608. Refer to Attachment C: Chain of Custody Records and FedEx Airbills.

On December 16, 2013, RST 2 shipped two additional bulk samples to the EMSL Analytical, Inc. laboratory located in Cinnaminson, New Jersey for asbestos analysis under COC No. 2-121613-123844-0010 and FedEx Airbill No. 873699443231. Refer to Attachment C: Chain of Custody Records and FedEx Airbills.



## 5. Personnel On Site:

<u>Name</u>	<u>Representing</u>	<u>Duties On-Site</u>
Angel Rodriguez	U.S. EPA, Region II	On-Scene Coordinator
Carlos Rivera	U.S. EPA, Region II	Air Program Support
Carlos Huertas	RST 2, Region II	Site Project Manager, Field Coordinator, Site QA/QC, Site Health and Safety, Sample Collection and Sample Management
Emilio Betancourt	RST 2, Region II	Sample Collection and Sample Management

## 6. Site Background:

The Site is located at Road 385, KM 5.4, Tallaboa, Poniente Peñuelas, Puerto Rico. During a visual inspection, the U.S. Environmental Protection Agency (EPA) identified fugitive dust clouds migrating out of the facility during demolition activities conducted by HOMECA Inc. Beginning in 2010 and continuing until the present, an asbestos abatement occurred at the Site. Improper asbestos abatement techniques may have been used at the Site resulting in potential asbestos contamination throughout the Site and in residential neighborhoods downwind of the Site. RST 2 was tasked with conducting multi-media sampling for asbestos at the Site and also at one residential property, one commercial property, and one school downwind of the Site.

## 7. Removal Assessment Summary:

On November 21, 2013, the EPA On-Scene Coordinator (OSC), and EPA Air Program representative, and RST 2 mobilized to the Site to perform multi-media sampling. As directed by the EPA OSC, RST 2 collected five bulk samples, including one field duplicate, four soil samples, including one field duplicate, and 10 wipe samples, including one wipe blank. Bulk samples were collected and submitted for asbestos analysis via EPA 600/R-93/116 Method using Polarized Light Microscopy (PLM). Soil samples were collected and submitted for asbestos analysis via modified EPA 600/R-93/116 Method using Transmission Electron Microscopy (TEM) with California Air Resource Board (CARB) 435 prep. Wipe samples were collected and submitted for asbestos analysis via American Society for Testing Materials (ASTM) 6480-05 Method. Samples were collected from outside areas where suspected asbestos contamination may have occurred and inside areas where asbestos may have entered the building.

On December 13, 2013, the EPA OSC and RST 2 remobilized to the Site to collect two additional bulk samples. The additional bulk samples were collected from two specific locations as directed by the EPA OSC. The two bulk samples were collected and submitted for asbestos analysis via EPA 600/R-93/116 Method using PLM. Samples were collected from outside areas where suspected asbestos contamination may have occurred. Refer to Attachment A, Figure 2: Sample Location Map for the depiction of where each of the samples were collected from. Refer to Attachment B, Table 1: Sample Collection Information Table for details regarding the locations of each sample collected. Refer to

Attachment D for the Photographic Documentation Log for the Removal Assessment sampling event.

**Bulk Sampling:**

Bulk presumably asbestos-containing material (PACM) samples were collected from areas on the Site as directed by the EPA OSC. All bulk PACM samples were suspected to have been from insulation that was used at the Site that was left on the ground post-abatement activities. All PACM identified on the Site was suspected to be friable and had the potential of migrating off site. Bulk PACM samples were collected and immediately placed inside two zip-lock bags in order to contain any asbestos fibers inside the bags. Samples were collected utilizing EPA's Environmental Response Team (ERT) Standard Operating Procedure (SOP) No. 2001, General Field Sampling Guidelines.

**Soil Sampling:**

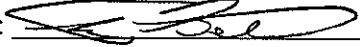
Three soil sample locations were chosen by the EPA OSC at the Site. Soil samples were collected from the surface at a depth of 0 to 6 inches using polyvinyl chloride plastic scoops. Samples were collected utilizing EPA's ERT SOP Nos. 2001, General Field Sampling Guidelines, and 2012, Soil Sampling.

**Wipe Sampling:**

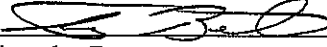
Surface dust samples were collected from areas where suspected asbestos contamination may have occurred, such as outdoor areas and nearby open windows inside of buildings, utilizing dedicated Ghost Wipes™. Samples were collected following the general guidance within the HUD Guidelines, Chapter 5: Risk Assessment. Each sample was collected from a 10 cm by 10 cm square (100 cm<sup>2</sup>) area utilizing EPA ERT SOP Nos. 2001, General Field Sampling Guidelines, and 2011, Chip, Wipe, and Sweep Sampling, as well as NIOSH Method 9100, as guidance.

**8. Analytical Discussion:**

Based on the validated analytical results, asbestos was detected in bulk PACM samples ranging from non-detect to 40 percent (%) amosite and 20% chrysotile, in soil samples ranging from 3 amosite/chrysotile asbestos structures to 9 amosite/chrysotile asbestos structures, and in wipe samples ranging from 7,760 structures per square centimeter (str/cm<sup>2</sup>) to 374,000 str/cm<sup>2</sup>. The two additional bulk samples collected on December 13, 2013 were both non-detect for asbestos. The wipe blank sample was non-detect for asbestos. Refer to Attachment B, Table 2: Validated Analytical Data Summary – Asbestos Bulk Samples, Table 3: Validated Analytical Data Summary – Asbestos Soil Samples, and Table 4: Validated Analytical Data Summary – Asbestos Wipe Samples.

Report prepared by:   
For Carlos Huertas  
RST 2 Site Project Manager

Date: 12/26/13

Report reviewed by:   
Timothy Benton  
RST 2 Operations Manager

Date: 12/26/13

## **ATTACHMENT A**

Figure 1: Site Location Map  
Figure 2: Sample Location Map



Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2013

## Legend



Site Location

0 0.05 0.1 0.2 0.3 0.4  
Miles



**Weston Solutions, Inc.**  
East Division

In Association With  
H & S Environmental, Inc.,  
Scientific and Environmental Associates, Inc.  
and Avatar Environmental, LLC.

## Figure 1 Site Location Map

**Puerto Rico Olefins Asbestos  
Penuelas, Puerto Rico**

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL SUPPORT TEAM 2  
CONTRACT # EP-W-06-072

DATE MODIFIED: 12/26/2013  
GIS ANALYST: T. BENTON  
EPA OSC: A. RODRIGUEZ  
RST SPM: C. HUERTAS  
FILENAME: SITEMAP.MXD





SCALE  
1:4,650

LEGEND  
 Site Boundary



**Figure 2**  
**Sample Location Map**

**Puerto Rico Olefins Asbestos Site**  
**Penuelas, Puerto Rico**

**UNITED STATES ENVIRONMENTAL**  
**PROTECTION AGENCY**  
REMOVAL SUPPORT TEAM 2  
CONTRACT # EP-W-06-072

**Weston Solutions, Inc.**  
In Association With  
Avatar Environmental, LLC,  
H & S Environmental, Inc. and  
Scientific and Environmental Associates, Inc.,

GIS ANALYST:	T. BENTON
EPA OSC:	A. RODRIGUEZ
RST 2 SPM:	C. HUERTAS
FILENAME:	Sample Location Map
FIGURE	2
REVISION	1
DATE MODIFIED	12/26/2013





## **ATTACHMENT B**

Table 1: Sample Collection Information Table

Table 2: Validated Analytical Data Summary – Asbestos Bulk Samples

Table 3: Validated Analytical Data Summary – Asbestos Soil Samples

Table 4: Validated Analytical Data Summary – Asbestos Wipe Samples

Table 1: Sample Collection Information Table  
 Puerto Rico Olefins Asbestos Site  
 Peñuelas, Puerto Rico  
 November 21, 2013 and December 13, 2013

Sample #	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type
ACM-001-001	PS 408	11/21/2013	13:18	Bulk	Grab	Asbestos	Field Sample
ACM-001-002	PS 408	11/21/2013	13:21	Bulk	Grab	Asbestos	Field Duplicate
ACM-002-001	PS 410	11/21/2013	13:23	Bulk	Grab	Asbestos	Field Sample
ACM-003-001	Front Flare	11/21/2013	13:30	Bulk	Grab	Asbestos	Field Sample
ACM-004-001	OV 409	11/21/2013	13:44	Bulk	Grab	Asbestos	Field Sample
P0001-ACM005-01	Chimneys East Property	12/13/2013	10:24	Bulk	Grab	Asbestos	Field Sample
P0001-ACM006-01	Metal Pile	12/13/2013	10:34	Bulk	Grab	Asbestos	Field Sample
S0001-0006-001	Front Flare	11/21/2013	13:31	Soil	Grab	Asbestos	Field Sample
S0002-0006-001	Next to Shed	11/21/2013	13:37	Soil	Grab	Asbestos	Field Sample
S0002-0006-002	Next to Shed	11/21/2013	13:39	Soil	Grab	Asbestos	Field Duplicate
S0003-0006-001	Main Entrance	11/21/2013	14:01	Soil	Grab	Asbestos	Field Sample
W-001-001	Front Flare	11/21/2013	13:33	Wipe	Grab	Asbestos	Field Sample
W-002-001	PS 402	11/21/2013	13:47	Wipe	Grab	Asbestos	Field Sample
W-003-001	Scrap Metal Front Crane	11/21/2013	13:50	Wipe	Grab	Asbestos	Field Sample
W-004-001	Crane- Driver Side Front Floor	11/21/2013	13:53	Wipe	Grab	Asbestos	Field Sample
W-005-001	Vertical Concrete	11/21/2013	13:39	Wipe	Grab	Asbestos	Field Sample
W-006-001	Metal Fence Highway	11/21/2013	14:35	Wipe	Grab	Asbestos	Field Sample
W-007-001	Residential House	11/21/2013	14:45	Wipe	Grab	Asbestos	Field Sample
W-008-001	Restaurant- El Velorio	11/21/2013	14:54	Wipe	Grab	Asbestos	Field Sample
W-009-001	Science Classroom	11/21/2013	15:15	Wipe	Grab	Asbestos	Field Sample
W-Blank-001	Blank	11/21/2013	13:00	Wipe	Grab	Asbestos	Wipe Blank



Table 2: Validated Analytical Data Summary - Asbestos Bulk Samples  
 Puerto Rico Olefins Asbestos Site  
 Peñuelas, Puerto Rico  
 November 21, 2013 and December 13, 2013

Sample #	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type	Asbestos % Type	
								Amosite	Chrysotile
ACM-001-001	PS 408	11/21/2013	13:18	Bulk	Grab	Asbestos	Field Sample	35	5
ACM-001-002	PS 408	11/21/2013	13:21	Bulk	Grab	Asbestos	Field Duplicate	30	6
ACM-002-001	PS 410	11/21/2013	13:23	Bulk	Grab	Asbestos	Field Sample	None Detected	None Detected
ACM-003-001	Front Flare	11/21/2013	13:30	Bulk	Grab	Asbestos	Field Sample	40	2
ACM-004-001	OV 409	11/21/2013	13:44	Bulk	Grab	Asbestos	Field Sample	2	20
P0001-ACM005-01	Chimneys East Property	12/13/2013	10:24	Bulk	Grab	Asbestos	Field Sample	None Detected	None Detected
P0001-ACM005-01	Metal Pile	12/13/2013	10:34	Bulk	Grab	Asbestos	Field Sample	None Detected	None Detected

Table 3: Validated Analytical Data Summary - Asbestos Soil Samples  
 Puerto Rico Olefins Asbestos Site  
 Peñuelas, Puerto Rico  
 November 21, 2013

Sample #	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type	Mineral Type(s)	# of Structures Detected	Analytical Sensitivity %	Asbestos Weight %
S0001-0006-001	Front Flare	11/21/2013	13:31	Soil	Grab	Asbestos	Field Sample	Amosite Chrysotile	3	0.1	0.1
S0002-0006-001	Next to Shed	11/21/2013	13:37	Soil	Grab	Asbestos	Field Sample	Amosite Chrysotile	9	0.1	0.6
S0002-0006-002	Next to Shed	11/21/2013	13:39	Soil	Grab	Asbestos	Field Duplicate	Amosite	3	0.1	< 0.1
S0003-0006-001	Main Entrance	11/21/2013	14:01	Soil	Grab	Asbestos	Field Sample	Amosite Chrysotile	6	0.1	< 0.1

Table 4: Validated Analytical Data Summary - Asbestos Wipe Samples  
 Puerto Rico Olefins Asbestos Site  
 Peñuelas, Puerto Rico  
 November 21, 2013

Sample #	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type	Asbestos Type	Asbestos Structures	Sensitivity *	Concentration (str/cm <sup>2</sup> )
W-001-001	Front Flare	11/21/2013	13:33	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	21	4,850	102,000
W-002-001	PS 402	11/21/2013	13:47	Wipe	Grab	Asbestos	Field Sample	Chrysotile	4	1,940	7,760
W-003-001	Scrap Metal Front Crane	11/21/2013	13:50	Wipe	Grab	Asbestos	Field Sample	Chrysotile	26	9,710	252,000
W-004-001	Crane- Driver Side Front Floor	11/21/2013	13:53	Wipe	Grab	Asbestos	Field Sample	Chrysotile	5	24,200	121,000
W-005-001	Vertical Concrete	11/21/2013	13:39	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	41	1,940	79,500
W-006-001	Metal fence Highway	11/21/2013	14:35	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	8	1,940	15,500
W-007-001	Residential House	11/21/2013	14:45	Wipe	Grab	Asbestos	Field Sample	Chrysotile	4	4,850	19,400
W-008-001	Restaurant- El Velorio	11/21/2013	14:54	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	77	4,860	374,000
W-009-001	Science Classroom	11/21/2013	15:15	Wipe	Grab	Asbestos	Field Sample	Chrysotile	16	1,940	31,000
W-Blank-001	Wipe Blank	11/21/2013	13:00	Wipe	Grab	Asbestos	Wipe Blank	None	< 2.99	Non Detected	Non Detected

\* Due to excessive particulate the analytical sensitivity of 260 str/cm<sup>2</sup> as required by the method was not reached.

## **ATTACHMENT C**

Chain of Custody Records and FedEx Airbills

## USEPA

Date Shipped: 11/22/2013

RFP# 272

PO# 0084459

## CHAIN OF CUSTODY RECORD

Site #: 0029 - 0122

Contact Name: Smita Sumbaly

Contact Phone: 732-585-4400

No: 00290122-112213-001

Cooler #: 001

Lab: EMSL

Lab Phone: 800-220-3675

Lab #	Sample #	Location	Analyses	Matrix	Collected	Numb Cont	Container	Preservative	MS/MSD
	ACM-001-001	PS 408	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	ACM-001-002	PS 408	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	ACM-002-001	PS 410	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	ACM-003-001	Front Flare	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	ACM-004-001	OV 409	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	S0001-0006-001	Front Flare	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		N
	S0002-0006-001	Next to shed	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		N
	S0002-0006-002	Next to shed	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		N
	S0003-0006-001	Main entrance	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		N
	W-001-001	Front Flare	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-002-001	PS 402	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-003-001	Front Crane	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-004-001	Crane	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-005-001	Vertical concrete	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-006-001	Metal fence highway	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-007-001	Residential House	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-008-001	Restaurant	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-009-001	Science classroom	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-Blank-001	Blank	Asbestos	Wipw	11/21/2013	1	Plastic Bag		N

## SAMPLES TRANSFERRED FROM

## CHAIN OF CUSTODY #

Special Instructions: 24 hrs Turn Around Time

Items/Reason	Relinquished by	Date	Received by	Date	Relinquished By	Date	Received by	Date	Time
All items for	Carlos Hunk	11/22/13	CDL	11/24/13					1045

5 bak  
4 sov  
16 wipe

OK



## Expanded Service International Air Waybill

For FedEx services worldwide including express freight services,  
dangerous goods, broker select, and letter of credit.

**1 From** Please print and print bold.  
Date 11/25/13 Sender's FedEx Account Number  
Sender's Name Carlos Huertas Phone 787-354-2489  
Company Weston Solutions  
Address 700 Calle Europa Esquina  
Address Fernandez Jimenez Suite 206  
City San Juan State Puerto Rico  
Country PSA ZIP Postal Code 00910

**2 To**  
Recipient's Name Scott Ross Phone 856-303-2538  
Company ENSL Analytical  
Address 200 Route 130 North  
City Cinnaminson State New Jersey  
Country USA ZIP Postal Code 08077  
Recipient's Tax ID Number for Customs Purposes  
e.g., GST/VAT/ID/IBAN, or as locally required.

**3 Shipment Information**  
Total Packages 1 Total Weight 7 kg lb oz in  
Shipper's Load and Count/Label B, B, B in cm

Commodity Description DETAIL REQUIRED	Harmonized Code	Country of Manufacture	Value for Customs REQUIRED
Example: 1-man's knitted sweater, 100 percent cotton.			
Environmenta/FOLD HERE BEFORE INSERTING IN POUCH. Samples (soil, Bulk, wipe) UN 2590 White Asbestos Net Qty 15.0kg			
Has ECVS been filed to AES? For U.S. Export Only: Check One <input checked="" type="checkbox"/> No ECVS required, value \$2,500 or less per Schedule B If other than NIP, enter License Exception: <input type="checkbox"/> No ECVS required, enter exemption number: <input type="checkbox"/> Yes - Enter AES proof of filing number:			
Total Declared Value for Carriage			Total Value for Customs (Specify Currency)

For Completion Instructions, see back of fifth page.

**Questions?**  
Go to our Web site at [fedex.com](http://fedex.com).  
or  
In the U.S., call 1.800.247.4747.  
Outside the U.S., call your local FedEx office.

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Not all services and options are available to all destinations.

**4a Express Package Service** Packages up to 150 lbs./68 kg.  
☒ FedEx Intl. Priority ☐ FedEx Intl. First  
Available to select locations.  
Highest rates apply. ☐ FedEx Intl. Economy  
FedEx Envelope and FedEx Pak  
not available.

**4b Express Freight Service** Packages over 150 lbs./68 kg.  
☐ FedEx Intl. Priority Freight ☐ FedEx Intl. Economy Freight

Booking Number **REQUIRED**  
Please call your local FedEx office to book shipments.

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☒ Other Pail BOX ☐ FedEx 10kg Box\* ☐ FedEx 25kg Box\*

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Available to select locations  
for FedEx Intl. Priority and  
FedEx Intl. Priority Freight only.  
Does this shipment contain dangerous goods?  
One box must be checked / marked.  
☐ No ☐ Yes ☒ Yes  
As per attached  
Shipper's Declaration  
Dangerous goods (including dry ice) cannot be shipped in  
FedEx packaging. ☐ Dry Ice  
Dry Ice 9 UN 1845 ☐ Cargo Aircraft Only

**6b Broker Selection**  
Not available with FedEx Intl. First. ☐ Intl. Broker Select  
To specify a broker other than FedEx.  
Broker's Name  
City/State/Province/Country  
ZIP/Postal Code **REQUIRED** Phone

**7a Payment Bill transportation charges to:**  
☐ Sender. Acct. No. in  
Section 1 will be billed. ☐ Recipient ☒ Third Party ☐ Credit Card ☐ Cash  
Check/ Cheque  
FedEx Acct. No. 402356103 FedEx Use Only  
Credit Card No.  
Credit Card Exp. Date

**7b Payment Bill duties and taxes to:** ALL shipments may be subject to Customs charges,  
which FedEx does not estimate prior to clearance.  
☐ Sender. Acct. No. in  
Section 1 will be billed. ☐ Recipient ☒ Third Party  
FedEx Acct. No. 402356103

**8 Your Internal Billing Reference** First 36 characters will appear on invoice.  
10-0029-0122

**9 Required Signature**  
Use of this Air Waybill constitutes your agreement to the Conditions of Contract on the back of this Air  
Waybill, and you represent that this shipment does not require a U.S. State Department License. Certain  
international treaties, including the Warsaw Convention, may apply to this shipment and limit our liability  
for damage, loss, or delay, as described in the Conditions of Contract.  
WARNING: These commodities, technology, or software were exported from the United States in accordance  
with Export Administration regulations. Diversion contrary to U.S. law prohibited.  
Sender's  
Signature:  
This is not a declaration to deliver this shipment without a required signature.  
FedEx  
Courier Receipt: [Signature] Date: [Date]  
For letter of credit shipments only.

Ship and track packages at [fedex.com](http://fedex.com)

FedEx  
Tracking  
Number 8713 7779 0608 Form  
ID No. 0425

**USEPA**

DateShipped: 12/16/2013

RFP# 272

PO# 0084577

## CHAIN OF CUSTODY RECORD

Site #: 0029 - 0122

**Contact Name:** Smita Sumbaly

**Contact Phone: 732-585-4400**

**No: 2-121613-123844-0010**

Cooler #: 1

Lab: EMSL

**Lab Phone: 800-220-3675**

041333879

[illegible]

Special Instructions: 24 Hour TAT Preliminary Data. Email results to Carlos.Huertas@WestonSolutions.com, Joel.Petty@WestonSolutions.com, and S.Sumbaly@WestonSolutions.com

**SAMPLES TRANSFERRED FROM**

**CHAIN OF CUSTODY #**

Items/Reason	Relinquished by (Signature and Organization)	Date/Time	Received by (Signature and Organization)	Date/Time	Sample Condition Upon Receipt
Alt transfer	Carlos Huertas/PSTJ <i>[Signature]</i>	12/16/13 1300hrs	<i>[Signature]</i> JMS164	10/17/13 10:31am	acceptable

27.2



# Expanded Service International Air Waybill

For FedEx services worldwide including express freight services, dangerous goods, broker select, and letter of credit.

## 1 From Please print and press hard.

Date 12/16/13 Sender's FedEx Account Number 950113 4 33 02 401 0001 0000 0000  
Sender's Name Carlos L Hunter Phone 87-354-2489  
Company Weston Solutions  
Address 700 calle Europa Esquina  
Address Fernandez Torres Suite 201  
City San Juan State Puerto Rico  
Country USA ZIP Postal Code 00910

## 2 To

Recipient's Name Sample Receiving Phone 856-303-2538  
Company EMSL Analytical  
Address 200 route 130 North  
Address  
City Cinnaminson State New Jersey  
Country USA ZIP Postal Code 08077

Recipient's Tax ID Number for Customs Purposes  
e.g. GST#RFL/VAT#IN/EIN/ABN, or as locally required.

## 3 Shipment Information

Total Packages 1 Total Weight 3 ☒ lbs. 13, 13, 13 ☐ kg DIM 13, 13, 13 cm  
Shipper's Load and Count/SLAC

Commodity Description	Harmonized Code	Country of Manufacture	Value for Customs
UN 2590 White Asbestos (Bulk) Class 9 4kg		USA	

Has EOI been filed in AES? ☒ Yes - Enter EOI number: 123456789 ☐ No EOI required, enter exemption number: 000000  
For EU Only: Tick here if goods are not in free circulation and provide CJ: ☐ 0000  
Total Declared Value for Carriage: 0.00 Total Value for Customs (Specify Currency): USD  
Yes - Enter AES proof of filing citation: 000000

For Completion Instructions, see back of fifth page.

Questions?  
Go to our Web site at [fedex.com](http://fedex.com).

In the U.S., call 1.800.GoFedEx 1.800.463.3339.  
Outside the U.S., call your local FedEx office.

The terms and conditions of service may vary from country to country. Consult our local office for specific information.  
Non-Negotiable International Air Waybill ©1994-2008 FedEx

## The World On Time.

Not all services and options are available to all destinations.

### 4a Express Package Service

Packages up to 150 lbs. / 68 kg

☒ FedEx Intl. Priority ☐ FedEx Intl. First Available to select locations. ☐ FedEx Intl. Economy FedEx Express and FedEx Pak rate not available.

### 4b Express Freight Service

Packages over 150 lbs. / 68 kg

☐ FedEx Intl. Priority Freight ☐ FedEx Intl. Economy Freight

Booking Number: 950113 4 33 02 401 0001 0000 0000  
Please call your local FedEx office to book shipments.

### 5 Packaging

\*These unique brown boxes with special pricing are provided by FedEx for FedEx and FedEx Priority only.

☐ FedEx Envelope ☐ FedEx Pak ☐ FedEx Box ☐ FedEx Tube  
☒ Other Box ☐ FedEx 10kg Box\* ☐ FedEx 25kg Box\*

### 6a Special Handling

☐ HOLD at FedEx Location ☐ SATURDAY Delivery Available to select locations for FedEx Intl. Priority and FedEx Intl. Priority Freight only.  
Does this shipment contain dangerous goods?  
☐ No ☒ Yes ☐ Dry Ice Dry ice, 9 UN 1845 ☐ Cargo Aircraft Only  
Dry ice must be checked / ticked. Yes per attached Shipper's Declaration. Shipper's Declaration not required.

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

### 6b Broker Selection

Not available with FedEx Intl. First.

☐ Intl. Broker Select To specify a broker other than FedEx.

Broker's Name

City / State / Province / Country

ZIP / Postal Code

Phone

### 7 Payment

Complete payment options for both transportation charges and duties and taxes.

Bill transportation charges to:

Enter FedEx Acct. No. or Credit Card No. below.  
☐ Sender Acct. No. in Section 1 will be billed. ☐ Recipient ☒ Third Party ☐ Credit Card ☐ Cash / Check / Cheque ☐ FedEx Use Only  
FedEx Acct. No. 402356103  
Credit Card No.  
Credit Card Exp. Date

Bill duties and taxes to:

ALL shipments may be subject to Customs charges, which FedEx does not estimate prior to clearance.

Enter FedEx Acct. No. below.  
☐ Sender Acct. No. in Section 1 will be billed. ☐ Recipient ☒ Third Party  
FedEx Acct. No. 402356103

### 8 Your Internal Billing Reference

First 24 characters will appear on invoice.

123456789012345678901234

### 9 Required Signature

Use of this Air Waybill constitutes your agreement to the Conditions of Contract on the back of this Air Waybill, and you represent that this shipment does not require a U.S. State Department license. Certain international treaties, including the Warsaw Convention, may apply to this shipment and limit our liability for damage, loss, or delay, as described in the Conditions of Contract.

**WARNING:** These commodities, technology, or software were exported from the United States in accordance with Export Administration regulations. Diversion contrary to U.S. law prohibited.

Sender's Signature: [Signature]

This is not a transportation document. It is not valid without a recipient's signature.

FedEx Courier Receipt: [Signature]

Date:

For letter of credit shipments only.



Ship and track packages at [fedex.com](http://fedex.com)

FedEx Tracking Number

8736 9944 3231

Form ID No.

0425

569

PART 158412 • Rev. Date 11/08  
©1994-2008 FedEx • PRINTED IN U.S.A. RRDA

RETAIN THIS COPY FOR YOUR RECORDS.



**ATTACHMENT D**

Photographic Documentation Log

**Photographic Documentation Log  
Puerto Rico Olefins Asbestos Site  
Peñuelas, Puerto Rico  
November 21, 2013 and December 13, 2013**



Photo 1: Samples ACM-001-001; ACM-001-002.



Photo 2: Sample ACM-002-001.

**Photographic Documentation Log  
Puerto Rico Olefins Asbestos Site  
Peñuelas, Puerto Rico  
November 21, 2013 and December 13, 2013**



Photo 3: Samples ACM-003-001; S0001-0006-001; W-001-001.



Photo 4: Samples S0002-0006-001; S0002-0006-002.



**Photographic Documentation Log**  
**Puerto Rico Olefins Asbestos Site**  
**Peñuelas, Puerto Rico**  
**November 21, 2013 and December 13, 2013**



Photo 5: Sample ACM-004-001



Photo 6: Sample W-002-001.



**Photographic Documentation Log**  
**Puerto Rico Olefins Asbestos Site**  
**Peñuelas, Puerto Rico**  
**November 21, 2013 and December 13, 2013**



Photo 7: Sample W-003-001.

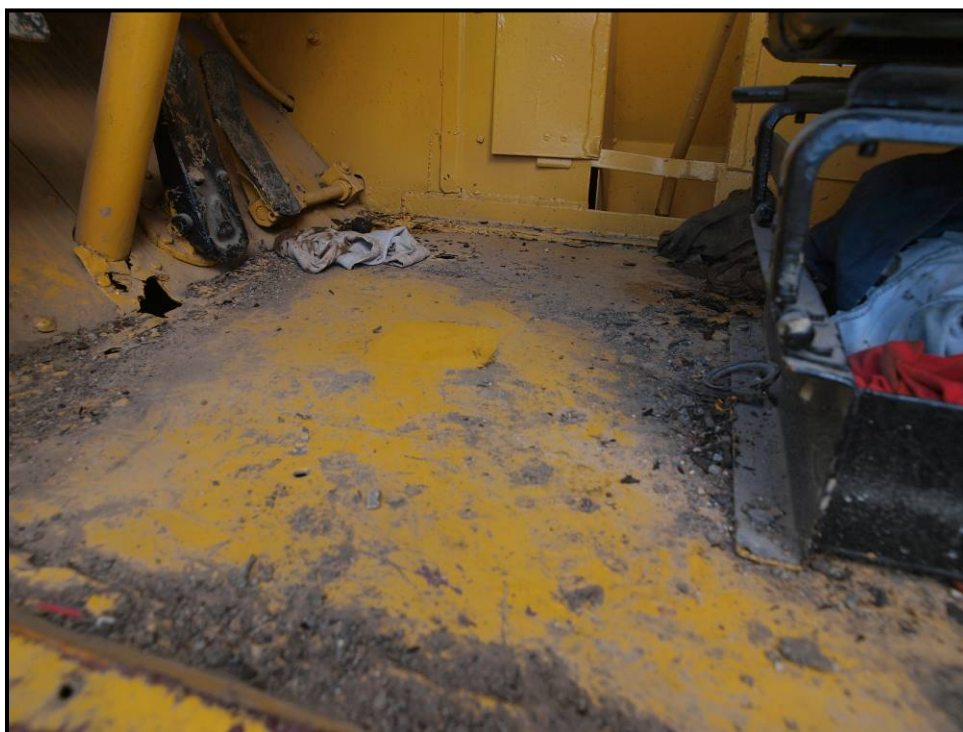


Photo 8: Sample W-004-001.



**Photographic Documentation Log  
Puerto Rico Olefins Asbestos Site  
Peñuelas, Puerto Rico  
November 21, 2013 and December 13, 2013**



Photo 9: Sample W-005-001.



Photo 10: Sample S0003-0006-001.



**Photographic Documentation Log**  
**Puerto Rico Olefins Asbestos Site**  
**Peñuelas, Puerto Rico**  
**November 21, 2013 and December 13, 2013**



Photo 11: Sample W-006-001.

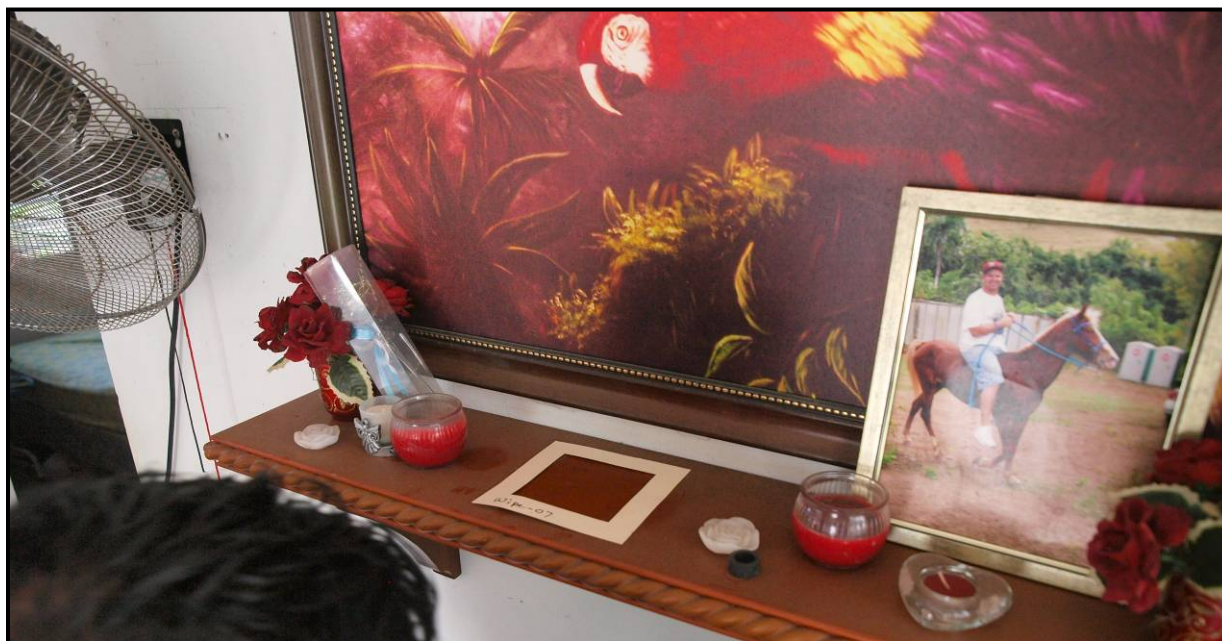


Photo 12: Sample W-007-001.

**Photographic Documentation Log**  
**Puerto Rico Olefins Asbestos Site**  
**Peñuelas, Puerto Rico**  
**November 21, 2013 and December 13, 2013**



Photo 13: Sample W-008-001.



Photo 14: Sample W-009-001.



**Photographic Documentation Log  
Puerto Rico Olefins Asbestos Site  
Peñuelas, Puerto Rico  
November 21, 2013 and December 13, 2013**



Photo 15: Sample P0001-ACM005-01.



Photo 16: Sample P0001-ACM006-01.